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If you have any comments on this draft form, you can submit them to us on our web site. Include the word DRAFT in your response. You may make comments anonymously, or you may include your name and e-mail address or phone number. We will be unable to respond to all comments due to the high volume we receive. However, we will carefully consider each suggestion. So that we can properly consider your comments, please send them to us within 30 days from the date the draft was posted.

Form **8858**

Information Return of U.S. Persons With Respect To Foreign Disregarded Entities

(December 2004) See separate instructions.

Department of the Treasury Internal Revenue Service

 OMB No. 1545-XXXX

Attachment Sequence No. **140**

Name of person filing this return		C .		Filer's	dentitying number
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to	o street address)				
City or town, state, and ZIP code					
Filer's tax year beginning , 20 , and end	-		20		
Important: Fill in all applicable lines and schedules. All infinitus. in U.S. dollars unless otherwise indicated.	ormation must b	e in Engli	sh. All am	ounts	must be stated
1a Name and address of foreign disregarded entity	100	U		b U.S. i	dentifying number, if any
c Country(ies) under whose laws organized and entity type under local tax law		d Date(s) of	organization		tive date as foreign garded entity
f If benefits under a U.S. tax treaty were claimed with respect to income of the foreign disregarded entity, enter the treaty and article number	nich principal vity is conducted	h Principal activity	ousiness	i Func	tional currency
2 Provide the following information for the foreign disregarded entity's accounting	period stated above.		'		
a Name, address, and identifying number of branch office or agent (if any) in the United States	b Name and addres person(s) with cu entity, and the lo	stody of the	oooks and rec	ords of t	he foreign disregarded
3 For the tax owner of the foreign disregarded entity (if different from the filer) pr	ovide the following:				
a Name and address	b Annual accounting return (see instruction)		ered by the	c U.S. i	dentifying number, if any
	d Country under wh	nose laws org	ganized	e Func	tional currency
4 For the direct owner of the foreign disregarded entity (if different from the tax	owner) provide the follow	ving:			
a Name and address	b Country under whose laws organized		ganized	c U.S. identifying number, if any	
				d Func	tional currency
5 Attach an organizational chart that identifies the name, placement, percentage the chain of ownership between the tax owner and the foreign disregarded entite each entity in which the foreign disregarded entity has a 10% or more direct or	ty, and the chain of own	ership betwe			
Schedule C Income Statement (see instructions)					
Important: Report all information in functional currency in U.S. dollars translated from functional currency (using GAAF under section 989(b)). If the functional currency is the U.S. do for special rules for foreign disregarded entities that use DA If you are using the average exchange rate (determined under the content of the content	P translation rules Ilar, complete only ASTM.	or the aventhe the or the U.S.	erage exch Dollars co	ange lumn.	rate determined See instructions
			Functional Cu	ırrency	U.S. Dollars
1 Gross receipts or sales (net of returns and allowances)		. 1			
2 Cost of goods sold		. 2			
3 Gross profit (subtract line 2 from line 1)		. 3			
4 Other income		. 4			
5 Total income (add lines 3 and 4)		. 5			
6 Total deductions		. 6			
7 Other adjustments		. 7			
		-			

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Sc	hedule C-1 Section 987 Gain or Loss Information				
		(a) Amount stated functional currence foreign disregarded	y of f	(b) Amount stated in functional currency of recipient	
1	Remittances from the foreign disregarded entity				
2	Section 987 gain (loss) of recipient				
				Yes	No
3	Were all remittances from the foreign disregarded entity treated as made to the direct	owner?			
4	Did the tax owner change its method of accounting for section 987 gain or loss	with respect t	to		
_	remittances from the foreign disregarded entity during the tax year?				
	hedule F Balance Sheet				
	portant: Report all amounts in U.S. dollars computed in functional currency a ordance with U.S. GAAP. See instructions for an exception for foreign disregard				
	Assets Beginning of annua accounting period) annual g period
1	Cash and other current assets				
2	Other assets				
3	Total assets				
	Liabilities and Owner's Equity				
4	Liabilities. 4				
5	Owner's equity				
6	Total liabilities and owner's equity				
Sc	hedule G Other Information				
				Yes	No
1	During the tax year, did the foreign disregarded entity own an interest in any trust? .				
2	During the tax year, did the foreign disregarded entity own at least a 10% interest, dire in any foreign partnership?	ectly or indirectl	y,		
3	Answer the following question only if the foreign disregarded entity made its election disregarded from its owner during the tax year: Did the tax owner claim a loss with redebt of the foreign disregarded entity as a result of the election?				
4	Answer the following question only if the foreign disregarded entity is owned directly domestic corporation and the foreign disregarded entity incurred a net operating loss for the foreign disregarded entity a separate unit as defined in Regulation section §1.1503-yes, see the instructions)	or the tax year:	ls		
5	Answer the following question only if the tax owner of the foreign disregarded entity is a corporation (CFC): Were there any intracompany transactions between the foreign disrept the CFC or any other branch of the CFC during the tax year, in which the foreign disregation as a manufacturing, selling, or purchasing branch?	garded entity an	id ed		
Sc	hedule H Current Earnings and Profits or Taxable Income (see instruction	ns)			
mp	ortant: Enter the amounts on lines 1 through 6 in functional currency.				
1	Current year net income or (loss) per foreign books of account		1		
2	Total net additions	I .	2		
3 Total net subtractions					
4 Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3).					
5 DASTM gain or loss (if applicable)					
6	Combine lines 4 and 5		6		
7	Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at t				
	exchange rate determined under section 989(b) and the related regulations (see instructions exchange rate used for line 7	tions))	7		